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Attorneys for Plaintiff Catalystix Inc.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CATALYSTIX INC., a Nevada corporation,

Plaintiff,

v.

LEGACY CREATIVE INC., an Alberta
corporation, and ANDREA REINDL
MCLEAN, an individual,

Defendants.

Case No. 2:21-CV-01253- JCM-EJY

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND BRIEFING
DEADLINES RELATED TO
DEFENDANTS' MOTION TO DISMISS
COMPLAINT**

[THIRD REQUEST]

Plaintiff Catalystix, Inc. ("Plaintiff") and Defendants Legacy Creative Inc. and Andrea Reindl McLean (collectively, the "Defendants"), by and through their undersigned counsel, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Plaintiff to file its opposition to Defendants' Motion to Dismiss Complaint (ECF No. 12) (the "Motion") from November 12, 2021 to December 23, 2021 and to extend the deadline for Defendants to file their reply in support of the Motion from December 1, 2021 to January 18, 2022. This is the third request to extend the deadline to file the opposition to the Motion and the second request to extend the reply deadline.

On October 8, 2021, Defendants filed the Motion. On October 22, 2021, the Court entered an

Order extending the deadline for Plaintiff to file an opposition to the Motion to November 5, 2021 (ECF No. 14). On November 3, 2021, the Court entered an Order extending the deadline for Plaintiff to file an opposition to the Motion to November 12, 2021 and for Defendants to file their reply to December 1, 2021 (ECF No. 16). The parties have scheduled a formal mediation with the Hon. Peggy Leen, which is set to occur on December 9, 2021. To preserve the parties and the Court's resources and to avoid any unnecessary fees and costs while the parties attempt to resolve this matter, they are requesting that the existing briefing deadlines be continued until after the parties have held mediation. If the parties are able to resolve this matter, they will provide notice to the Court. If not, the parties will proceed with the briefing schedule indicated herein. The parties do not oppose these additional extension requests. This request is made in good faith and is not intended to unreasonably delay this matter.

Based on the foregoing, the parties respectfully request that this Court extend Plaintiff's deadline to file its opposition to the Motion from November 12, 2021 to December 23, 2021 and to extend Defendants' reply deadline from December 1, 2021 to January 18, 2022.

DATED this 11th day of November, 2021.

DATED this 11th day of November, 2021.

ARMSTRONG TEASDALE LLP

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By: /s/ Brandon P. Johansson

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Attorneys for Catalystix Inc.

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATE: November 12, 2021